

1 GARG GOLDEN LAW FIRM
ANTHONY B. GOLDEN, ESQ.
2 Nevada Bar No. 9563
PUNEET K. GARG, ESQ.
3 Nevada Bar No. 9811
3185 St. Rose Parkway, Suite 325
4 Henderson, Nevada 89052
Tel: (702) 850-0202
5 Fax: (702) 850-0204
Email: pgarg@garggolden.com
6 Email: agolden@garggolden.com

7 Counsel for Defendants Ryan Roach,
New Choice Communications, Inc., and
8 Lighthouse Communications, LLC

9
10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 R. ALEXANDER ACOSTA, Secretary of Labor,
13 United States Department of Labor,

14 Plaintiff,

15 v.

16 WELLFLEET COMMUNICATIONS, LLC, a
Nevada Limited Liability Company; NEW
17 CHOICE COMMUNICATIONS, INC., a
Nevada Corporation; LIGHTHOUSE
18 COMMUNICATIONS, LLC, a Nevada Limited
Liability Company; ALLEN ROACH, an
19 individual; RYAN ROACH, aka RYAN LORE,
an individual,

20 Defendants.
21

CASE NO.: 2:16-cv-02353-GMN-GWF

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND DEADLINE TO
RESPOND TO FIRST AMENDED
COMPLAINT**

(First Request)

22 Plaintiff, R. Alexander Acosta, Secretary of Labor, United States Department of Labor, by
23 and through the Secretary's counsel of record, and Defendants, New Choice Communications,
24 Inc., ("New Choice"), Lighthouse Communications, LLC ("Lighthouse"), and Ryan Roach
25 ("Ryan") (collectively, "Defendants"), by and through their counsel of record, the Garg Golden
26 Law Firm, hereby stipulate to extend the deadline for Defendants to answer or otherwise respond
27 to Plaintiff's First Amended Complaint ("FAC") (ECF No. 44) to **November 6, 2017** and for
28 Plaintiff to respond by **December 8, 2017** to any motion Defendants might file in response to the

1 FAC.

2 Counsel for Defendants had an unexpected death in the family and had to go out of town
3 last minute for a funeral and was therefore unable to complete the responsive pleading to the FAC.
4 Additionally, the parties were in several depositions in this case pursuant to the stipulated
5 discovery extension, which required Defendants' counsel's attendance despite not having appeared
6 in the case yet. This is the first request for an extension of this deadline, it is not made for the
7 purposes of delay, and the parties submit that good cause appears for the extension. The extension
8 will allow Defendants' counsel sufficient time to complete the responsive pleading to the FAC and
9 for Plaintiff's counsel to respond, if necessary.

10 Dated this 30th day of October, 2017

Dated this 30th day of October, 2017

11 GARG GOLDEN LAW FIRM

U.S. DEPARTMENT OF LABOR

12
13 By /s/ Anthony B. Golden
14 ANTHONY B. GOLDEN, ESQ.
15 3185 St. Rose Parkway, Suite 325
16 Henderson, Nevada 89052
17 (702) 850-0202
Counsel for Defendants Ryan Roach,
New Choice Communications, Inc., and
Lighthouse Communications, LLC

By /s/ Tara Stearns
LARA BREMER, ESQ.
TARA STEARNS, ESQ.
DAVID EDELI, ESQ.
Trial Attorneys
Counsel for Plaintiff Secretary of Labor

18 **ORDER**

19 IT IS SO ORDERED

20
21 
22 U.S. MAGISTRATE JUDGE

23 DATED: October 31, 2017
24
25
26
27
28